

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

UNITED STATES OF AMERICA                          )  
  )  
  )  
v.   )      Case No. 3:13-cr-00049-1  
  )  
RUSSELL BROTHERS, JR.                              )      Magistrate Judge Griffin  
  )

**MOTION OF DEFENDANT BROTHERS TO  
TERMINATE SPECIAL CONDITION OF RELEASE**

**COMES NOW** the Defendant, **Russell Brothers, Jr.**, by and through his undersigned counsel hereby respectfully requests that the Court enter an order terminating the Special Condition of the Defendant's release requiring him to telephone his pretrial services officer twice a day, seven days a week. In support hereof, Defendant states as follows:

1.        On March 18, 2013, the Defendant was released on an *Appearance Bond* (Docket Entry 11), an *Order Setting Conditions of Release* (Docket Entry 11), and an *Agreement to Forfeit Property* (Docket Entry 12). Among the Special Conditions of the Defendant's release, he has been required over the past five months or so to "call his pre-trial services officer twice a day 7 days a week from his land line at his Burns [Tennessee] address." (Docket Entry 11). Mr. Brothers has faithfully complied with this and all the conditions of his release.
  
2.        U.S. Probation Pretrial Services Officer Angela Smith Rankin has advised undersigned counsel that Mr. Brothers has been fully compliant with this condition and has never failed to call probation as directed. Based on his compliance and his good conduct while on bond, Ms. Rankin no longer believes that this telephone reporting requirement is necessary and does not oppose this request.

**WHEREFORE**, based on the foregoing, Defendant Brothers respectfully requests that the

Court enter an order terminating the Special Condition of the Defendant's release requiring him to telephone his pre-trial services officer twice a day, seven days a week.

Respectfully submitted,

TUNE, ENTREKIN, & WHITE, P.C.  
315 Deaderick Street, Suite 1700  
Nashville, TN 37238  
(615) 244-2770

BY: s:/ Peter J. Strianse  
PETER J. STRIANSE

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been sent via the Court's electronic filing system unless not registered and, in that event deposited in the United States mail, postage prepaid, to

Brent A. Hannafan  
Assistant United States Attorney  
110 Ninth Avenue South  
Suite A961  
Nashville, TN 37203-3870

**VIA Fax**  
Angela Smith Rankin  
U.S. Probation Pretrial Services Officer  
(615) 736-5519

this 8<sup>th</sup> day of October, 2013.

S:/ Peter J. Strianse  
PETER J. STRIANSE